

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

In re: \*

MATT GUZIK \* Case No. 14-2-1901-JS  
(Chapter 7)

\* Debtor \*

\* \* \* \* \*

MATT GUZIK \* Adversary No. 14-0-0723

Plaintiff \*

v. \*

FORD MOTOR CREDIT COMPANY LLC \*

Defendant \*

\* \* \* \* \*

**ANSWER TO COMPLAINT TO COMPEL TURNOVER OF DEBTOR PROPERTY  
PURSUANT TO 11 U.S.C. §522(g) AND (h)  
AND REQUEST FOR ATTORNEYS FEES**

Ford Motor Credit Company LLC, by its attorney, Michael J. Klima, Jr., files its Answer To Complaint To Compel Turnover Of Debtor Property Pursuant To 11 U.S.C. §522(g) And (h) And Request For Attorneys Fees and states as follows:

1. Defendant admits the allegations contained in Paragraph 1 of the Complaint.

2. Defendant admits the allegations contained in Paragraph 2 of the Complaint.

3. Defendant admits the allegations contained in Paragraph 3 of the Complaint.

4. Paragraph 4 of the Complaint contains conclusions of law to which Defendant is not required to respond.

5. Defendant admits the allegations contained in Paragraph 5 of the Complaint.

6. Defendant admits the allegations contained in Paragraph 6 of the Complaint.

7. Defendant admits it obtained judgment against the Plaintiff on August 21, 2013 in the District Court of Maryland for Anne Arundel County, but denies the remaining allegations contained in Paragraph 7 of the Complaint.

8. Defendant admits the allegations contained in Paragraph 8 of the Complaint.

9. Defendant is without information sufficient as to form a belief as to the truth of the allegations contained in Paragraph 9 of the Complaint, and those allegations are thereby denied.

10. Defendant admits the allegations contained in Paragraph 10 of the Complaint.

11. Defendant is without information sufficient as to form a belief as to the truth of the allegations contained in

Paragraph 11 of the Complaint, and those allegations are thereby denied.

12. Defendant is without information sufficient as to form a belief as to the truth of the allegations contained in Paragraph 12 of the Complaint, and those allegations are thereby denied.

13. Paragraph 13 of the Complaint contains conclusions of law to which Defendant is not required to respond.

14. Paragraph 14 of the Complaint contains conclusions of law to which Defendant is not required to respond.

15. Paragraph 15 of the Complaint contains conclusions of law to which Defendant is not required to respond.

16. Defendant denies the allegations contained in Paragraph 16 of the Complaint.

WHEREFORE, Defendant, Ford Motor Credit Company LLC, respectfully requests the Court dismiss the Complaint To Compel Turnover Of Debtor Property Pursuant To 11 U.S.C. §522(g) And (h) And Request For Attorneys Fees.

/s/ Michael J. Klima, Jr.  
Michael J. Klima, Jr. #25562  
810 Glen Eagles Court  
Suite 312  
Baltimore, MD 21286  
(410)837-1140  
Attorney File: 10-2037

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30<sup>th</sup> day of September, 2014, a copy of the foregoing Answer To Complaint To Compel Turnover Of Debtor Property Pursuant To 11 U.S.C. §522(g) And (h) And Request For Attorneys Fees was mailed, first class, postage prepaid, to:

Marc A. Ominsky, Esquire  
10632 Little Patuxent Parkway  
Suite 249  
Columbia, MD 21044

Marc H. Baer  
Chapter 7 Trustee  
455 Main Street  
Reisterstown, MD 21136

/s/ Michael J. Klima, Jr.  
Michael J. Klima, Jr.